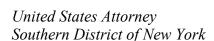
U.S. Department of Justice



86 Chambers Street New York, New York 10007

March 17, 2025

By ECF Hon. Jesse M. Furman United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: *Khalil v. Joyce*, 25-cv-1935 (JMF)

Dear Judge Furman:

This Office represents the government in this case. We write respectfully, with the consent of Petitioner's counsel, to request that the Court grant the government leave *nunc pro tunc* to file an oversized reply brief in further support of its motion to dismiss or transfer. Your Honor's individual rules set the limitations for such briefs at 3,500 words, and the government's reply brief is approximately 900 words over that limit (at 4,395 words). We apologize for exceeding the Court's word limit, and for this belated request.

We thank the Court for its consideration of this request.

Respectfully submitted,

MATTHEW PODOLSKY Acting United States Attorney for the Southern District of New York

By: /s/ Brandon M. Waterman

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cc: Counsel of Record (by ECF)